

FILED: KINGS COUNTY CLERK 08/10/2020 12:19 PM

INDEX NO. 507394/2020

SUPREME COURT OF THE STATE OF NEW YORK
NYSCEF DOC. NO. 7Attorney: HARMON, LINDER &
ROGOWSKY, ESQS. - 5
RECEIVED NYSCEF: 08/10/2020

COUNTY OF KINGS

FARID KHIDIROV

Index #: 507394/2020

Plaintiff(s)

- against -

Purchased: May 25, 2020

Date Filed:

2 BROTHERS TRUCKING, LLC ET AL

Defendant(s)

AFFIDAVIT OF COMPLIANCE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

STEVEN C AVERY BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY
TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF
NEW YORK.

That on June 3, 2020 at 10:15 AM at


THE OFFICE OF THE SECRETARY OF STATE
99 WASHINGTON AVENUE
ALBANY, NY 12231deponent served the within two true copies of the SUMMONS & VERIFIED COMPLAINT &
NOTICE OF ELECTRONIC FILING on 2 BROTHERS TRUCKING, LLC therein named,**SECRETARY
OF STATE**A Domestic Corporation by delivering thereat two true copies to NANCY DOUGHERTY personally, deponent
knew said corporation so served to be the corporation described in said summons as said defendant and knew
said individual to be AUTHORIZED to accept thereof.Service upon the N.Y.S. Secretary of State under SECTION 304 LIMITED LIABILITY COMPANY LAW and tendering the required fee of
\$40.00.**MAILING**Deponent enclosed a true copy of same in a postpaid wrapper properly addressed to defendant at defendant's last
known residence/actual place of business at195 NEW BRUNSWICK AVE
PERTH AMBOY, NJ 08861and deposited said wrapper in a post office or official depository under exclusive care and custody of the United
States Postal Service within New York State on June 4, 2020 by REGISTERED MAIL-RETURN RECEIPT
REQUESTEDRECEIPT #RE 190 617 882 US in an envelope marked PERSONAL & CONFIDENTIAL and not indicating on the
outside envelope thereof, by return address or otherwise that the communication is from an attorney or concerns an
action against the party to be served.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx.)
FEMALE	WHITE	BROWN	55	5'4	145

Registered mail return envelope was received by deponent on July 27 2020, returned by the U.S. Post Office, marked
"return to sender-unclaimed". On July 27 2020, a true copy of said Summons and Verified Complaint and Notice was
mailed to defendant at said address by first class mail with certificate of mailing

Sworn to me on: July 27, 2020

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2022

Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021
Gotham Process Inc.
299 Broadway
New York NY 10007

STEVEN C AVERY

Docket #: *1156778*

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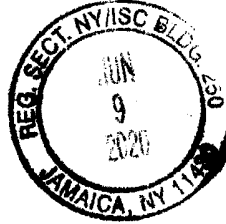
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9 Broadway
Suite 1401
New York, NY 10007

LN
6/12/20
DU



UNITED STATES POSTAL SERVICE
REGISTERED MAIL™



RE 190 617 882 US

Label 200, August 2005

PSN 7690-03-000-9311

2 BROTHERS TRUCKING, LLC
195 NEW BRUNSWICK AVE
PERTH AMBOY, NJ 08861

PERSONAL AND CONFIDENTIAL



Certificate Of Mailing

To pay fee, affix stamps or
meter postage here.

This Certificate of Mailing provides evidence that mail has been presented to USPS® for mailing.
This form may be used for domestic and international mail.

From:

GOTHAM PROCESS INC.
299 BROADWAY SUITE 1401
NEW YORK, NY 10007-1907

To:

2 Brothers Trucking LLC
195 New Brunswick Ave
Perth Amboy NJ 08861

Postmark Here.

PS Form 3817, April 2007 PSN 7530-02-000-9065

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NYSCEF DOC. NO. 1

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RECEIVED NYSCEF: 05/25/2020

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF **KINGS**

-----X
FARID KHIDIROV,

Plaintiff,

against

2 BROTHERS TRUCKING, LLC and JOSE F. GARCIA,

Defendants.
-----X

Index No.

Summons

Plaintiff designates

KINGS County

1270 East Nineteenth Street, #6H

Brooklyn, NY 11230

The basis of venue designated is:

Plaintiff(s) residence.

To the above named Defendant(s)

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, of if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

DATED: New York, New York
May 12, 2020



Harmon, Linder & Rogowsky, Esqs.
Attorneys for Plaintiff(s)
3 Park Avenue, 23rd Floor
Suite 2300
New York, NY 10016

2 Brothers Trucking, LLC
195 New Brunswick Avenue
Perth Amboy, NJ 08861

Jose F. Garcia
195 New Brunswick Avenue
Perth Amboy, NJ 08861

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF **KINGS**

-----x
FARID KHIDIROV,

VERIFIED COMPLAINT

Plaintiff,

-against-

2 BROTHERS TRUCKING. LLC and JOSE F. GARCIA,

Defendants.

-----x
Plaintiff, complaining of the defendants herein by his
attorneys, HARMON, LINDER & ROGOWSKY, ESQS., respectfully sets
forth and alleges, as follows:

**AS AND FOR A CAUSE OF ACTION
ON BEHALF OF FARID KHIDIROV**

1. That at the time of the commencement of this action plaintiff
was a resident of the County of **KINGS**, State of New York.

2. That at all times herein mentioned defendant, **2 BROTHERS
TRUCKING, LLC**, was a corporation authorized to do business in
the State of New York.

3. That at all times herein mentioned defendant, **2 BROTHERS
TRUCKING, LLC**, was the owner of an automobile bearing
registration number **xflx25**, **State of New Jersey**.

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4. That at all times herein mentioned defendant, **JOSE F. GARCIA**, was the operator of the aforesaid automobile bearing registration number **xflx25, State of New Jersey**.

5. That at all times herein mentioned defendant, **JOSE F. GARCIA**, was in physical charge, operation, management and control of the aforesaid vehicle owned by the defendant, **2 BROTHERS TRUCKING, LLC**, with the knowledge, consent, and permission, either express or implied of the defendant owner thereof.

6. That at all times herein mentioned plaintiff, **FARID KHIDIROV**, was the operator of an automobile bearing registration number **T654567C, State of New York**.

7. That on the **Twenty-Sixth day of November 2019**, at approximately **10:48 a.m.**, the aforesaid vehicles came into contact with plaintiff's vehicle at **Central Park West**, at or near its intersection with **West Eighty-First Street**, a public street and thoroughfare, in the County of **New York**, State of New York.

8. The defendants so carelessly and negligently operated their aforesaid respective vehicles so as to cause the aforesaid contact.

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9. That as a result of the foregoing, this plaintiff was caused to and did sustain severe and serious injuries and was required to seek and obtain medical care and attention in an effort to cure and alleviate same and, upon information and belief, will be compelled to do so in the future.

10. That the aforesaid occurrence and the injuries sustained by this plaintiff were caused by the negligence of the defendants.

11. That this plaintiff has sustained a serious injury as the same is defined in Subdivision "d" of Section 5102 of the Insurance Law of the State of New York.

12. That this action falls within one or more of the exceptions set forth in Section 1602 of the CPLR.

13. That by reason of the foregoing, plaintiff, **FARID KHIDIROV**, has been damaged in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE, plaintiff, **FARID KHIDIROV**, demands judgement against the defendant in the **Cause of Action** in an amount which exceeds the jurisdictional limits of all lower courts that would

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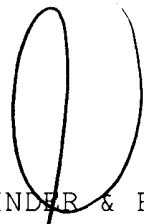
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otherwise have jurisdiction; all together with the costs and disbursements of this action.

Dated: New York, NY
May 12, 2020



HARMON, LINDER & ROGOWSKY, ESQS.
Attorney(s) For Plaintiff(s)
3 Park Avenue, Suite 2300
New York, New York 10016
(212) 732-3665
MJL/mj

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Year

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF **KINGS**

FARID KHIDIROV,

Plaintiff,

-against-

2 BROTHERS TRUCKING. LLC and JOSE F. GARCIA,

Defendants.

SUMMONS AND VERIFIED COMPLAINT

HARMON, LINDER & ROGOSWKY, ESQS.

Attorney for Plaintiff(s)
3 Park Avenue, 23rd Floor
Suite 2300
New York, NY 10016
(212) 732-3665 Phone
(212) 732-1462 Facsimile

To:
Attorney(s) for Defendant

Service of a copy of the within Summons and Complaint is hereby admitted.

Dated:

Attorney(s) for

PLEASE TAKE NOTICE

☐ Notice of Entry that the within is a (certified) true copy of a
entered in the office of the clerk of the within named Court on

☐ Notice of Settlement
that an order of which the within is a true copy will be presented for settlement to the
Hon. _____, one of the judges of the within named Court, at _____,
on _____.

Dated:

Yours, etc.
Harmon, Linder & Rogowsky, Esqs.
Attorneys for Plaintiff
3 Park Avenue, Suite 2300
New York, NY 10016
(212) 732-3665